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03-77

January 23, 2004

RECEIVED

JAN 23 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, D.C. 20554

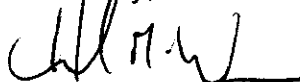
RE: Amendment of Section 73.2020(b)  
Table of Allotments, FM Broadcast Stations  
(Ashland, Coaling, Cordova, Decatur, Dora, Hackleburg,  
Hobson City, Holly Pond, Midfield, Sylacauga, and  
Tuscaloosa, Alabama, and Atlanta, Georgia)

Dear Madame:

Enclosed for filing are an original and four (4) copies of Joint Comments on Counterproposal in the above-referenced matter.

Should there be any questions, please contact the undersigned counsel to Williams Communications.

Sincerely,

  
Howard M. Weiss

Enclosure

cc: All Parties on Certificate of Service

014  
GAD: E

Before the  
Federal Communications Commission  
Washington, DC 20554

RECEIVED

JAN 23 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Amendment of Section 73.202(b) )  
Table of Allotments, ) MM Docket No. 3-77  
FM Broadcast Stations )  
(Ashland, Coaling, Cordova, Decatur, )  
Dora, Hackleburg, Hobson City, )  
Holly Pond, Midfield, Sylacauga, and )  
Tuscaloosa, Alabama, and Atlanta, ) RM- 10660  
Georgia)

To: Assistant Chief, Audio Division  
Media Bureau

**JOINT COMMENTS ON COUNTERPROPOSAL**

Cox Radio, Inc., and its wholly owned subsidiary CXR Holdings, Inc. (collectively "Cox"), Williams Communications ("Williams"), and KEA Radio, Inc. and Pulaski Broadcasting, Inc. (collectively "Counterproponents") hereby respectfully submit their Comments on the foregoing Counterproposal in response to the Commission's Notice of January 8, 2004 (Report No. 2642). In support hereof, the following is stated:

1. Cox, Williams and the Counterproponents wholeheartedly support adoption of both the proposal made by Cox and Williams, of which the Commission gave notice on March 21, 2003 (DA 03-816), and the Counterproposal, as modified by the Joint Additional Supplemental Comments filed by the parties on December 19, 2003. As the Joint Comments point out, the proposals, as modified, are no longer mutually exclusive and therefore can both be granted. Grant of the Cox and Williams proposal will result in a preferential arrangement of allotments by providing Midfield, Hackleburg and Coaling, Alabama with their first local transmission services. Further, Hobson City will receive its first competitive and first aural nighttime service. Grant of the Counterproposal will


provide a first local transmission service to Killen, Alabama and a net gain of radio service to more than 200,000 persons.

2. The Counterproposal Notice includes reference coordinates for Killen and Scottsboro. Cox, Williams, and the Counterproponents support use of these coordinates, but also reiterate their earlier proposal that the Commission specify the following coordinates for the allotment at Ashland, Alabama: 33-13-30/085-53-40.

3. Accordingly, the parties urge the Commission promptly to adopt both proposals, conserving administrative resources while achieving substantial allocations benefits.

Respectively submitted

**COX RADIO, INC**  
**CXR HOLDINGS, Inc**

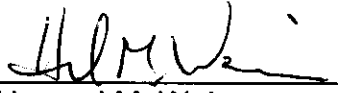
By: 

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Christina H. Burrow  
Nam E. Kim

Their Attorneys

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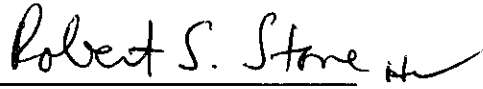
**WILLIAMS COMMUNICATIONS**

By:   
Howard M. Weiss

Its Attorney

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**KEA RADIO, INC.  
PULASKI BROADCASTING, INC.**

By:   
Robert S. Stone

Their Attorney

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2021 first Tennessee Plaza  
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## CERTIFICATE OF SERVICE

I, Evelyn Thompson, a secretary at Fletcher, Heald & Hildreth PLC, hereby certify that a true and correct copy of the foregoing "Joint Comments On Counterproposal" was sent on this 23rd day of January, 2004, via First-Class United States mail, postage pre-paid, to the following:

\*Mr. John A. Karousos  
Federal Communications Commission  
Media Bureau  
Audio Division  
445 12<sup>th</sup> Street, S.W.  
Room 3-A266  
Washington, DC 20554

Ms. Penelope Nielsen  
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287 Telephone Tower Road  
Lacey's Springs, AL 35754

Mr. Houston Pearce  
New Century Radio, Inc.  
142 Skyland Boulevard  
Tuscaloosa, AL 35405

Mr. Clark Jones  
Voice of Cullman, L.L.C.  
Eddins Broadcasting Co., Inc.  
18 Col. Winstead Drive  
Brentwood, TN 37037

\*R. Barthen Gorman, Esquire  
Federal Communications Commission  
Media Bureau  
Audio Division  
445 12<sup>th</sup> Street, S.W.  
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Washington, DC 20554

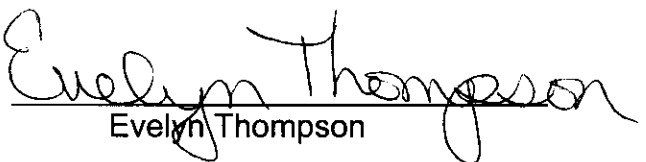
\*Denotes hand delivery.

\*Robert Hayne, Esquire  
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Chris Williams  
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391 14<sup>th</sup> Avenue South  
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Evelyn Thompson